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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE  
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her  
guardian *ad litem* Maria Cadena,  
individually and as successor-in-interest  
to Hector Puga; I.H., a minor by and  
through his guardian *ad litem* Jasmine  
Hernandez, individually and as  
successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
guardian *ad litem* Lydia Lopez,  
individually and as successor-in-interest  
to Hector Puga; and ANTONIA SALAS  
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISAIAH KEE;  
MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA; ROBERT  
VACCARI; JAKE ADAMS; and DOES  
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

*Honorable Kenly Kiya Kato*

**DECLARATION OF HANG D. LE IN  
SUPPORT OF PLAINTIFFS'  
MOTIONS IN LIMINE NOS. 1-5**

1 I, Hang D. Le, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the United States  
3 District Court for the Central District of California. I make this Declaration in  
4 Support of Plaintiffs Motions in Limine Nos. 1-5. I have personally familiar with the  
5 matters stated herein and could testify competently thereto if called.

6 2. Attached hereto as “**Exhibit A**” is a true and correct copy of the Rule  
7 26 Report of County Defendants’ forensic psychologist Kris Mohandie, Ph.D.

8 3. Attached hereto as “**Exhibit B**” is a true and correct copy of the Rule  
9 26 Report of County Defendants’ expert Joshua Peter Visco, Esq.

10 4. Attached hereto as “**Exhibit C**” is a true and correct copy of the Rule  
11 26 Report of County Defendants’ toxicologist Richard Clark, M.D.

12 5. Attached hereto as “**Exhibit D**” is a true and correct copy of the Rule  
13 26 Report of County Defendants’ police practices expert Ken Hubbs.

14 6. Attached hereto as “**Exhibit E**” is a true and correct copy of the Rule  
15 26 Report of State Defendants’ police practices expert Grey Meyer.

16 7. Attached hereto as “**Exhibit F**” is a true and correct of the relevant  
17 portions of the February 12, 2025 Deposition of Greg Meyer.

18 8. Attached hereto as “**Exhibit G**” is a true and correct email  
19 correspondence from County Defendants producing subpoenaed documents after the  
20 January 2, 2025 fact discovery cut-off.

21 9. Attached hereto as “**Exhibit H**” is a true and correct copy of  
22 Defendants County of San Bernardino, Robert Vaccari and Jake Adams’ Third  
23 Supplemental Disclosures Pursuant to Fed. R. Civ. P. 26.

24 10. Attached hereto as “**Exhibit I**” is a true and correct copy of Defendants  
25 County of San Bernardino, Robert Vaccari and Jake Adams’ Fourth Supplemental  
26 Disclosures Pursuant to Fed. R. Civ. P. 26

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1 I declare under penalty of perjury under the laws of the State of California and the  
2 United States of America that the foregoing is true and correct. Executed this 17th  
3 day of April 2025, in Los Angeles, California.

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6 Hang D. Le